

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	Case No. 1:21-CR-66
	:	
FRED ALDRIDGE,	:	Judge McFarland
	:	
Defendant,	:	

**MOTION FOR TEMPORARY RELEASE TO ATTEND FUNERAL**

Now comes the Defendant Fred Aldridge, by and through counsel, and respectfully requests that the Court permit him to attend his brother's funeral on Tuesday, February 22, 2021, at the Phillips Funeral Home in Ironton, Ohio. (See Exhibit A, Obituary – submitted to chambers and opposing counsel via email).

Mr. Aldridge is currently being held at the Butler County Jail on a one-count indictment charging him with possession of methamphetamine with the intent to distribute. If the Court were to grant this Motion and order Mr. Aldridge temporarily released from custody for the sole purpose of attending his brother's funeral, Mr. Aldridge's brother (Eugene Aldridge) would transport him to and from the funeral service within the timeframe set by the Court. According to the obituary, the visitation is set to begin at 5:00 p.m. and the service is to be held immediately following the visitation at 7:00 p.m. (While the obituary indicates that the visitation will begin at 5:00 p.m., the family has indicated that they are to arrive at the funeral home by 4:00 p.m.). Given this schedule, Mr. Aldridge's family is requesting that the Court release him from custody at 11:00 a.m. on Tuesday, February 22, 2022 and permit him to return by 12:00 a.m. on Wednesday, February 23, 2022. Importantly, the family is seeking a longer timeframe because the travel from Ironton, Ohio to the Butler County Jail is just under three hours one way.

Mr. Aldridge's temporary release would not endanger the public, nor would he pose a risk of flight because his family has indicated they would guarantee his return to the Butler County Jail. Counsel for the government objects to this request.

Importantly, precedent from this Court supports the request Mr. Aldridge has made. The Court, in the case of *United States v. Jack Collins*, case number 1:20-CR-73, granted the defendant's request for temporary release to attend a funeral despite the government's opposition.<sup>1</sup> See, Case No. 1:20-CR-72 (R.24, Court Order, PAGE ID #65-66) (Judge Dlott). For the reasons set forth herein, Mr. Aldridge requests that this Court do the same.

Wherefore, based on the foregoing, Mr. Aldridge requests that the Court grant him temporary release from custody on Tuesday February 22, 2022 at 11:00 p.m. and order his return no later than 12:00 a.m. on Wednesday, February 23, 2022.

Respectfully submitted,

s/ Zenaida R. Lockard  
Zenaida R. Lockard (KY93402)  
Assistant Federal Public Defender  
250 East Fifth Street, Suite 350  
Cincinnati, Ohio 45220  
(513) 929-4834

Attorney for Defendant  
Fred Aldridge

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the Defendant's Motion For Temporary Release was served electronically upon Tim Oakley, Assistant United States Attorney, Office of the United States Attorney, 221 East Fourth St., Suite 400, Cincinnati, Ohio, 45202, this 18th day of February 2022.

s/ Zenaida R. Lockard  
Zenaida R. Lockard (KY93402)  
Assistant Federal Public Defender

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<sup>1</sup> Notably, in *Collins*, the Court granted the motion for a temporary release even though Mr. Collins's offense conduct involved flight, he had a lengthy criminal record, and he had significant exposure as a career offender if convicted.